



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

September 30, 2011

Mollie Chaudet
Deschutes National Forest
1001 SW Emkay Drive
Bend, Oregon 97702

Re: U.S. Environmental Protection Agency (EPA) comments for the Deschutes National Forest, Ochoco National Forest and Crooked River National Grassland (Forests) Travel Management Project Final Environmental Impact Statement (FEIS). EPA Project Number: 08-034-AFS.

Dear Ms. Chaudet:

The U.S. Environmental Protection Agency (EPA) has reviewed the Deschutes National Forest, Ochoco National Forest and Crooked River National Grassland (Forests) Travel Management Project Final Environmental Impact Statement (FEIS). Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

To reduce the risk of invasive plant spread and adverse impacts to native plants and heritage resources from dispersed motorized camping, we recommended that the Forest expand the area covered by special provisions. By selecting Alternative 3, Modified, the Forests have expanded the area covered by special provisions – as compared to Alternative 2, Proposed Action – by approximately 300,000 acres. We believe that this expansion of area where motorized access for dispersed camping is limited to only existing, designated, and defined sites, no closer than 30 feet to a stream, wetland, or water body represents a substantial increase in environmental protection relative to the Proposed Action and we commend the Forests for this decision.

To increase the rate which roads and trails that cause environmental damage are closed and decommissioned, we recommended that the FEIS include additional information about how future Motor Vehicle Use Maps (MVUM) will be used to identify and designate a "minimum system." As noted in our comments on the DEIS, we commend the Forests for the over 1,200 miles of road closure and decommissioning that have been accomplished since the early 1990s. We also appreciate that, as stated in the FEIS, "...the Forest Service shares EPA's concerns for the impacts associated with roads, including the potential effect on water quality." (Appendix D, p. 81). In general, annual updates to the MVUM, which incorporate all travel management decisions, appear to be a useful way to implement the iterative process required to achieve a minimum road system. While we have not reviewed the Travel Management Implementation Strategy that the Forests have developed for implementing the final Record of Decision and Environmental Impact Statement, we are hopeful that the strategy will effectively facilitate the Forests' plans to identify and designate a minimum system consistent with

regional and national direction. We also believe that the Forests' development of a Travel Management Implementation Strategy is responsive to our implementation and administration recommendations.

To ensure that this project is consistent with the Forests' efforts to reduce sediment input to streams and protect water quality, we recommended that the FEIS disclose, to the best extent possible, how relevant Total Maximum Daily Loads (TMDL) and Water Quality Restoration Plans (WQRP) may influence the future development of MVUMs. We appreciate the FEIS's additional explanation of how TMDLs influence Water Quality Management Plans and how Water Quality Management Plans in turn could influence future MVUMs. The Deep Creek WQRP, which proposes to close and inactivate approximately 17 miles of road, decommission about 27 miles of road and reconstruct 2.5 miles of road, all in an effort to reduce sediment deposition in nearby water bodies and attain good water quality appears to be an example of the type of project which would restore and protect water quality and is facilitated by the MVUM update process.

Because we believe, as does the Forest Service, that accounting for future changes in climate in project planning is an important aspect of environmental protection, we recommended that the FEIS more fully discuss the climate change adaptation aspects of the project. The additional information in FEIS Chapter 3, particularly the sub-section "The Effect of Climate Change on the Proposal", is responsive to our recommendation. We also note our support for the interpretation that Alternative 3, Modified's superior positioning of the two Forests and Grassland to adapt to future changes in climate conditions contributes to its identification as the Environmentally Preferable Alternative.

Overall, we support your selection of Alternative 3, Modified, because it is the Environmentally Preferable Alternative and particularly because it expands the area covered by special provisions relative to the Proposed Action. Also, the additional information in the FEIS with regard to MVUM updates, water quality protection and other issues is responsive to our recommendations.

If you have any questions or concerns please contact me at (206) 553-1601 and by electronic mail at reichgott.christine@epa.gov or Erik Peterson of my staff at, (206) 553-6382, or by electronic mail at peterson.erik@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit